

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose
<i>This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.</i>
II. Directions
<ol style="list-style-type: none"> 1. Please complete a separate form for each issue. 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission. 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference. 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.
III. Submitting Carrier(s) General Information
<p>Submitted by: <i>TDS Metrocom</i></p> <p>Contact <i>Todd McNally</i> Telephone Number: 608-441-7959 e-mail: todd.mcnally@tdsmetro.com</p> <p>Subject Matter Expert (SME): <i>Todd McNally</i> Telephone Number: 608-441-7959 e-mail: todd.mcnally@tdsmetro.com</p> <p>Authorized Representative: <i>Rod Cox</i> Telephone Number: 608-663-3029 e-mail: rod.cox@tdsmetro.com</p>
IV. Issue Identification
<p>Name: (short identifier) <i>Design CO Construction, Customer Connection, Admin charges.</i></p> <ol style="list-style-type: none"> 1. Brief Description: <i>In January 2003, TDS Metrocom discovered that SBC was inappropriately billing us for Design CO Construction, Customer Connection, Administrative type charges contrary to agreements between our two companies.</i>
V. Analysis of Issue
<p>Please answer the following questions:</p> <ol style="list-style-type: none"> 1. When this issue was first discovered?

TDS Metrocom discovered this issue in January 2003.

2. How many occurrences and approximately over how long a period of time?
Exact number of occurrences is unknown at this time. This has affected SBCs billing accuracy since October 2001 and continues with current billing.

3. Is it a recurring problem?
Yes. Contrary to affidavits filed by SBC in March 2003 stating that they expected to resolve this issue within the next bill cycle, the problem continues with June invoices.

4. Your belief as to the cause of the problem.
Based on our understanding of SBCs process, systems and invoices, TDS Metrocom is left with the impression that the cause for this exception is the result of SBCs inadequate billing OSS. Specifically as it relates to change management controls.

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *TDS Metrocom is not aware of any specific interpretation issues.*

6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? *High*

7. Any other pertinent information? *Not at this time. We reserve the right to add additional information as it becomes available.*

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?
Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since November 2002.

2. Was this issue escalated for dispute resolution? If so, when and in what forum?
Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since November 2002.

3. Last known position of the opposing carrier.
SBC has acknowledged the validity of our dispute claim, however after roughly 7 months, they continue to struggle to correct their billing OSS to resolve this issue.

4. Were any bill adjustments made to resolve this issue?
Some.

5. Were any policies or procedures changed to address this issue? If so, what changes were made?

TDS Metrocom can only assume that SBC is in the process of making changes.

VII. Relief Sought

TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC:

1. *Audit of SBCs current process to assure that 100% of exceptions are corrected and billing stopped and adjusted accordingly, including any associated LPCs.*
2. *Provide documentation of SBCs process in place to assure that future exceptions are prevented.*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with

statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
The problem was the result of a special arrangement in the TDS ICA Appendix ITR 3.2 regarding Two-way trunking which included sharing of cost. The USOCs (CZ8X4 and 1YTX4) were not zero-rated at the time of contract implementation. The TIRKS billing database was not programmed to "0" rate the billing USOC. This has been corrected and the billing will be monitored to insure no further billing on these facilities. The programming was done in the May 2003 time frame; however, it was discovered that the NRCs were not credited. This extended the time for resolving the large amount of claims.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
Yes. It arises from the agreement between SBC and TDS and is stated in the Interconnection Agreement.
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information?
No late payment fees will be assessed. All credits were issued by August 26, 2003.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
See above.
2. Were any bill adjustments made to resolve this issue? *Yes. As of August 26, 2003, all adjustments have been made and TDS will see the adjustments on the next bills. Some adjustments have already appeared.*
3. How were the adjustments communicated to the submitting carrier?
The final adjustments will be communicated via a billing resolution form from the Local Service Center Representative. Please attach any relevant accessible letter(s). N/A
4. Identify any other carrier(s) known to have experienced similar problems. *Not aware of any.*
5. Did you identify any other problems arising from or related to this issue? *No.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue?
The Account Team has scheduled a biweekly meeting with TDS to monitor and update this billing issue. Please attach any relevant accessible letter(s). N/A
7. Were any policies or procedures changed to address this issue? If so, what changes were made?
The TIRKS Billing System was programmed to \$0 rate the USOCs CZ8X4 and 1YTX4.

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*Submitted by: *SBC*Contact: *Jim Jermain*Telephone Number: *(608) 252-2359*e-mail: *jj8571@sbc.com*Subject Matter Expert (SME): *Sharmaine Summerville*Telephone Number: *(312) 335-6724*e-mail: *ss7419@sbc.com*Authorized Representative: *Glen Sirles*Telephone Number: *(214) 858-0700*e-mail: *gs1066@sbc.com***X. Further Investigative Activities** *(for staff use only)***XI. Final Disposition** *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

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II. Directions

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

III. Submitting Carrier(s) General Information

Submitted by: *TDS Metrocom*

Contact *Todd McNally*

Telephone Number: 608-441-7959

e-mail: todd.mcnally@tdsmetro.com

Subject Matter Expert (SME): *Todd McNally*

Telephone Number: 608-441-7959

e-mail: todd.mcnally@tdsmetro.com

Authorized Representative: *Rod Cox*

Telephone Number: 608-663-3029

e-mail: rod.cox@tdsmetro.com

IV. Issue Identification

Name: (short identifier) *Direct End Office Trunks (DEOTs)*

1. Brief Description: *In April 2003, TDS Metrocom discovered that SBC was inappropriately billing us for direct end office trunks contrary to our ICA.*

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?

TDS Metrocom discovered this issue in April 2003.

2. How many occurrences and approximately over how long a period of time?
Exact number of occurrences is unknown at this time. This has affected SBCs billing accuracy for 24 months and counting.

3. Is it a recurring problem?

Yes. We continue to see these charges on our June 2003 invoices.

4. Your belief as to the cause of the problem.

Based on our understanding of SBCs process, systems and invoices, TDS Metrocom is left with the impression that the cause for this exception is the result of SBCs inadequate billing OSS combined with lacking change management controls.

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *TDS Metrocom feels that it is, specifically, SBC not being able to consistently implement change management events related to interconnection agreements.*

6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? *High*

7. Any other pertinent information? *Not at this time. We reserve the right to add additional information as it becomes available.*

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?

Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since April 2003.

2. Was this issue escalated for dispute resolution? If so, when and in what forum?

Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since April 2003.

3. Last known position of the opposing carrier.

SBC has acknowledged the validity of our dispute claim, however struggles to correct it and make appropriate adjustments in a timely manner.

4. Were any bill adjustments made to resolve this issue?

Yes

5. Were any policies or procedures changed to address this issue? If so, what changes were made?

TDS Metrocom can only assume that SBC is in the process of making changes.

VII. Relief Sought

TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC:

- 1. The correction of the root cause associated with this discovery so SBC terminates their billing of these charges.*
- 2. Audit of SBCs current process to assure that 100% of exceptions are corrected and billing stopped and adjusted accordingly.*
- 3. Provide documentation of SBCs process in place to assure that future exceptions are prevented.*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
SBC initiated a project during the 4th quarter of 2000 to begin billing for End Office Integration Service (EOIS) circuits in place in SBC Midwest between a CLEC's Point of Interconnection (POI) and their switch or Point of Presence (POP) in the LATA. These circuits were to be billed at either Access rates or UNE rates according to the individual CLEC contracts. This initiative was consistent with language found in the ICAs and pertinent tariffs. Circuits on the SBC side of the POI were to have continued to be zero-rated (not billed). In error, the project established billing on all EOIS circuits, whether or not the facility was located on the SBC or CLEC side of the POI.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
Indirectly, the issue involves contract and tariff interpretations. The error was not in interpreting either document, but in the fact that there was no mechanism in place to allow the billing systems to differentiate between EOIS circuits and Access Circuits, and no safeguards in place to determine on which side of the POI the circuits were built.
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information? *N/A*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *Yes. Billing for Direct End Office Trunks (DEOTs), which should be zero rated, was corrected, and credits were applied to the June and/or July 2003 bills.*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
The Account teams talked with representatives of TDS Metrocom on or about July 7, 2003. Written notification of the credits and bill corrections was sent to TDS Metrocom in August 2003.
4. Identify any other carrier(s) known to have experienced similar problems.
Allegiance, Focal, Globaleyes, ICG, Intermedia, KMC, Level 3, McLeod, Ovation, Pae Tech, Winstar, WorldCom, XO Communications, Gabriel, MCI, Sigecom, Time Warner, US Exchange, Adelphia, Buckeye, Choice One, Cincinnati Bell, Frontier, AT&T.
5. Did you identify any other problems arising from or related to this issue? *No.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
SBC's NIT (Network Interconnection Team) leads manually inventoried each and

every active circuit carrying local traffic across a Local Interconnection network. With this inventory, each circuit was evaluated and billing applicability was determined. The existing architectures were compared with pre-planning letters, contracts, and tariffs. Circuits that were billed incorrectly were identified and corrected. The Account Teams reviewed the contracts to determine an accurate stake date for the credits. The Local Service Center issued all of the correcting orders and made all the appropriate changes to the records to insure accurate billing from this point forward.

7. Were any policies or procedures changed to address this issue? If so, what changes were made?

SBC has developed and implemented an online tool that identifies the CLECs, their Interconnection architectures, whether billing does or does not apply, and other pertinent information for the LSC Service Representative to use to determine correct billing. SBC implemented a process by which a Service Representative may contact the appropriate NIT lead to determine the correct billing if specific information is not populated in the online tool. Further, a project is currently under way to establish unique Classes of Service to differentiate circuits established for Local Interconnection from those established for Access services. By establishing these new Classes of Service, SBC can establish and apply specific Local Interconnection billing requirements. With the online tool, the NIT team, and the implementation of the new Classes of Service, this billing error will not re-occur.

IX. Opposing Carrier's General Information (to be completed after July 30, 2003, prehearing)

Submitted by: SBC

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X. Further Investigative Activities (for staff use only)

XI. Final Disposition (for staff use only)

Investigation into the Wholesale Billing Practices of
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II. Directions

1. *Please complete a separate form for each issue.*
2. *Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
3. *Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
4. *Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

III. Submitting Carrier(s) General Information

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Contact *Todd McNally*

Telephone Number: *608-441-7959*

e-mail: todd.mcnally@tdsmetro.com

Subject Matter Expert (SME): *Todd McNally*

Telephone Number: *608-441-7959*

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Authorized Representative: *Rod Cox*

Telephone Number: *608-663-3029*

e-mail: rod.cox@tdsmetro.com

IV. Issue Identification

Name: *(short identifier) Disconnected Circuits*

1. Brief Description: *In March 2003, TDS Metrocom discovered that SBC was inappropriately billing us for circuits we had previously sent disconnect orders on. These disconnect orders were from as far back as June 2002.*

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?

TDS Metrocom discovered this issue in March 2003.

2. How many occurrences and approximately over how long a period of time?
Exact number of occurrences is unknown at this time. This has affected SBCs billing accuracy for roughly 11 months.

3. Is it a recurring problem?
It was for 11 months worth of billing cycles. TDS Metrocom continues to research our invoices to identify additional exceptions.

4. Your belief as to the cause of the problem.
Based on our understanding of SBCs process, systems and invoices, TDS Metrocom is left with the impression that the cause for this exception is the result of SBCs inadequate billing OSS. Specifically as it relates to the process in place to validate orders are worked correctly, timely, and associated billing adjustments made.

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *TDS Metrocom is not aware of any specific interpretation issues.*

6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? *High*

7. Any other pertinent information? *Not at this time. We reserve the right to add additional information as it becomes available.*

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?
Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since March 2003.

2. Was this issue escalated for dispute resolution? If so, when and in what forum?
Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since March 2003.

3. Last known position of the opposing carrier.
SBC has acknowledged the validity of our dispute claim, however after roughly 3 months, they continue to struggle to correct the associated LPCs associated with this issue.

4. Were any bill adjustments made to resolve this issue?
Yes, partial. See #3 above.

5. Were any policies or procedures changed to address this issue? If so, what changes were made?
TDS Metrocom can only assume that SBC is in the process of making changes.

VII. Relief Sought

TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC:

1. *Audit of SBCs current process to assure that 100% of exceptions are corrected and billing stopped and adjusted accordingly, including any associated LPCs.*
2. *Provide documentation of SBCs process in place to assure that future exceptions are prevented.*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
SBC did experience some trouble with orders going into error status as they went down stream to the TIRKS system due to errors on the service orders.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
No.
3. What performance measures can be implemented to monitor the desired system operation?
On July 18, 2003 SBC implemented some new software (Mechanized Errored Service Order Image Delivery System) "MEDS" to proactively address this issue. The new software will notify the Service Representative when the order errors going down stream.
4. Any other pertinent information?
No.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
An error was identified and corrected.
2. Were any bill adjustments made to resolve this issue?
Yes. Full credit was given to TDS along with all late payment charges.
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
The adjustment was communicated by a dispute resolution.
4. Identify any other carrier(s) known to have experienced similar problems.
N/A
5. Did you identify any other problems arising from or related to this issue?
No.
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
N/A
7. Were any policies or procedures changed to address this issue? If so, what changes were made?
On July 18, 2003 New Software—"MEDS"—was implemented, which will notify the service representative immediately when an order errors to avoid this problem in the future.

Submitted by: SBC

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X. Further Investigative Activities.

XI. Final Disposition.

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Authorized Representative: *Rod Cox*
Telephone Number: 608-663-3029
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IV. Issue Identification

Name: Non existent documentation for adjustments.

1. Brief Description: In addition to the numerous surprise back billing by SBC to date, TDS Metrocom has been made aware that they will be making several hundred thousand dollars worth of adjustments made to our future invoices. The only supporting information we have regarding an explanation for these charges are a result of a phone conversation with our Account Manager. Even then, only a fraction of the supporting explanation for these adjustments was made available to us, of which were only provided verbally. To date, SBC has yet to honor our request for written documentation explaining these adjustments. However, on the other hand,

when TDS Metrocom is required to dispute a charge on our invoice, we are required to provide the following supporting facts related to the dispute or the dispute claim will be rejected as incomplete:

- Account Identifier
- Bill Date
- Circuit ID
- Claim Amount
- Customer Comments
- USOC

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered? Although TDS has had this general concern with unexplained, or lacking detail with adjustments, this latest example occurred in July 2003.
2. How many occurrences and approximately over how long a period of time? Specific to this issue, we do not have any idea as to the volume of these adjustments due to the lacking documentation provided by SBC and the timing of the discovery.
3. Is it a recurring problem? Unknown at this time.
4. Your belief as to the cause of the problem. TDS Metrocom is left to believe that the cause is due to SBC remedying inefficiencies in their Billing OSS.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? Unknown at this time.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? High.
7. Any other pertinent information? None at this time.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes. Via written request to SBC Account Management on July 14, 2003.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? Yes. Via written request to SBC Account Management on July 14, 2003.
3. Last known position of the opposing carrier. SBC has not yet provided TDS Metrocom with a position related to this issue.
4. Were any bill adjustments made to resolve this issue? TDS Metrocom is left in the position of having to wait to see the impacts of this issue on our future invoices.
5. Were any policies or procedures changed to address this issue? If so, what changes were made? TDS Metrocom is not aware of any, nor has SBC made us aware of any.

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).) TDS Metrocom requests that in addition to a performance measure developed to capture such billing accuracy errors, that the following remedies get implemented by SBC:

- 1.) *Written documentation from SBC outlining, at minimum, what the adjustments are for, USOCs affected, rates used, the root cause for the adjustment, s*
- 2.) *Audit of SBCs current process to assure that 100% of exceptions are corrected and invoices adjusted accordingly.*
- 3.) *Provide documentation of SBCs process in place to assure that future exceptions are prevented.*

VIII. Opposing Carrier's Response (to be completed after July 30, 2003, prehearing)

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.

Loop Zone Issue

As a result of a CLEC dispute filed in Michigan and Ohio, SBC Midwest completed an investigation to verify whether it is billing the proper UNE loop rate zone for each wire center in five Midwest states, including Wisconsin. The identification of the appropriate UNE loop rate zone is complicated by the fact that the state tariff lists rate zones by exchange (i.e. center city or town), not by CLLI code. Thus, the exchange must be translated to a CLLI code. Further, some CLLIs serve multiple exchange center cities (or towns) that may have different rate zones. Based upon this investigation, SBC Midwest identified eight (8) single-rate wire centers in Wisconsin in which SBC Midwest had previously billed an incorrect loop rate for loops served in those wire centers (there are 105 wire centers in Wisconsin). All unbundled loop types in these aforementioned wire centers were affected, including stand-alone loops, UNE-P loops, and the high frequency portion of the loop (HFPL). SBC Midwest issued an Accessible Letter CLECAM-196 on June 6, 2003, to provide CLECs notice of this issue.

With respect to the eight wire centers with erroneous coding at the wire center level, SBC Midwest updated all unbundled loop rates to apply the correct loop rate zone in support of ongoing order activity. As a consequence of discovering these rate-zone issues, SBC Midwest has now issued appropriate credit and debit adjustments for prior billing on the embedded base of affected loops.

Bus/Res Classification

TDS Metrocom brought a dispute that SBC Midwest had misclassified certain residential 2-wire analog UNE loops as business loops, resulting in a failure to apply the discount provided under the merger discount amendment to the parties' interconnection agreement.

As a result of an error made in the April 2002 software upgrade to MOR, requests for new stand-alone 2-wire analog residential loops were incorrectly classified as business loops. The error was not identified until SBC Midwest pre-tested a

November 2002 OSS Release. The coding logic that caused the error was corrected with the implementation of the November software upgrade release, but it could not correct the embedded base of loops that had been ordered between April 20 and November 9, 2002. This had no effect on UNE P orders.

During its investigation, SBC Midwest reviewed the orders for all stand-alone 2-wire analog UNE loops that had been placed between April 20 and November 9, 2002. As a result of this investigation, SBC Midwest identified 14,415 impacted loops for eight (8) ACNAs in Wisconsin.

In order to correct the billing for the 14,415 impacted loops identified in Wisconsin, SBC Midwest created a utility in May that would mechanically generate service orders to change the loop classification from business to residential on a going-forward basis and it ran that utility in late May and early June. With respect to prior billing, adjustments were generated from the service orders created by the utility back to the date the loop was originally established. These adjustments appeared in the Other Charges and Credits section of the CLECs' CABS bills, and will be identified by the words "LOOP MRGR BLG". Account Managers contacted all affected CLECs to explain these corrective actions and to provide further details. These adjustments were completed by June 1, 2003.

With respect to the approximately 9,858 affected loops that are no longer in service, SBC Midwest calculated manual adjustments to the CLECs. These adjustments were issued to CLECs and completed by June 16, 2003.

Accessible Letter CLECAM03-197 was sent to CLECs advising them of this issue on June 6, 2003

End Office Integration

Beginning in 2001, SBC incorrectly applied a charge to facilities that should have been zero-rated based on the CLEC's Interconnection Agreement. SBC made billing changes to retroactively apply the correct rates as well as bill the correct rates prospectively. Adjustments were applied to CLEC's June and July BANs.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
These issues do not involve a disputed interpretation or application of law.
3. What performance measures can be implemented to monitor the desired system operation?
No additional performance measures are required.
4. Any other pertinent information? *N/A*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue?

Specific to Wisconsin:

TDS was backbilled \$(redacted) for Zone Issue

TDS was credited \$(redacted) for the Bus/Res Issue

TDS was credited \$(redacted) for the EOI Issue

3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).

CLECAM03-196 communicated the Zone Issue.



CLECAM03-196.doc
(83 KB)

CLECAM03-197 communicated the Res/Bus Issue.



CLECAM03-197.doc
(41 KB)

The Account Team contacted TDS the week of July 7th to advise them of the pending adjustments and sent an e-mail on August 6th.

4. Identify any other carrier(s) known to have experienced similar problems.

Zone Issue (Total WI ACNAs impacted = 9)

AAV

UXW

WUA

MSN

SGZ

TPM

OCB

LOA

TVN

Res/Bus Issue (Total WI ACNAs impacted = 7)

ICY

NDT

OCB

MSN

UXW

WSQ

KCO

EOI Issue (Total WI ACNAs impacted = 7)

KMM

LVC

MSN

OCB

UXW

WSW

WUA

5. Did you identify any other problems arising from or related to this issue?
No.
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
See above.
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *See above.*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact : *James Jermain*

Telephone Number: *608-252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Mark S. Chamberlin*

Telephone Number: *(415) 545-1647*

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Authorized Representative: *Diana L Young*

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X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. *Please complete a separate form for each issue.*
2. *Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
3. *Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
4. *Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

III. Submitting Carrier(s) General Information

Submitted by: *TDS Metrocom*

Contact *Todd McNally*

Telephone Number: *608-441-7959*

e-mail: todd.mcnally@tdsmetro.com

Subject Matter Expert (SME): *Todd McNally*

Telephone Number: *608-441-7959*

e-mail: todd.mcnally@tdsmetro.com

Authorized Representative: *Rod Cox*

Telephone Number: *608-663-3029*

e-mail: rod.cox@tdsmetro.com

IV. Issue Identification

Name: *(short identifier) Early Termination Liability*

1. Brief Description: *On our January 13, 2003 invoice, SBC Assessed an early termination penalty for disconnecting a circuit a day early. The contract end date was on a Saturday and due to that, we requested a disconnect for that Friday.*

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?

TDS Metrocom discovered this issue in February 2003.

2. How many occurrences and approximately over how long a period of time?
Exact number of occurrences is unknown at this time as we are only aware of one so far. This has affected SBCs billing accuracy for 3 months..

3. Is it a recurring problem?
We continue to research to see if this issue continues to happen.

4. Your belief as to the cause of the problem.
Based on our understanding of SBCs process, systems and invoices, TDS Metrocom is left with the impression that the cause for this exception is the result of SBCs inappropriate recognition of business days compared to calendar days.

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *TDS Metrocom does not feel that it does.*
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? *Low*
7. Any other pertinent information? *Not at this time. We reserve the right to add additional information as it becomes available.*

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?
Yes. Via a dispute claim in February 2003.
2. Was this issue escalated for dispute resolution? If so, when and in what forum?
Yes. Via numerous conversations and written communication with SBC Account Management.
3. Last known position of the opposing carrier.
SBC finally adjusted our account.
4. Were any bill adjustments made to resolve this issue?
Yes
5. Were any policies or procedures changed to address this issue? If so, what changes were made?
TDS Metrocom is not aware of any changes.

VII. Relief Sought

TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC:

1. *Documented process of how SBC differentiates between calendar days and business days when it comes to determining contract term dates.*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
TDS Metrocom was billed according to the tariff, FCC No. 2. This is an access tariff, federal in jurisdiction, and its application is not subject to the

Commission's jurisdiction.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.

The charge was calculated according to the tariff FCC 2 Section 7.4.10c.

3. What performance measures can be implemented to monitor the desired system operation? *None.*

4. Any other pertinent information?

TDS Metrocom did request the circuit be disconnected one day prior to the termination of the contract. Per SBC's tariff, FCC 2 section 7.4.10c, termination charges do apply if a circuit is disconnected prior to the expiration date of the contract. Nevertheless, SBC did adjust the termination charges to the CLECs satisfaction, as a courtesy only.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*

2. Were any bill adjustments made to resolve this issue?

All termination charges were adjusted, as a courtesy only.

3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).

Dispute resolutions were sent to the customer via e-mail and the Access Service Center did confirm with the customer that they concurred with the credit provided.

4. Identify any other carrier(s) known to have experienced similar problems. *N/A.*

5. Did you identify any other problems arising from or related to this issue? *No.*

6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).

N/A

7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information (to be completed after July 30, 2003, prehearing)

Submitted by: *SBC*

Contact: *James Jermain*

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e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Janis Campo*

Telephone Number: *: 217-747-7950*

e-mail: *jc1658@SBC.com*

Authorized Representative: *Sue West*

Telephone Number : *312-335-6532*

e-mail: *sw3273@sbc.com*

X. Further Investigative Activities

XI. Final Disposition

MN182800_1

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. *Please complete a separate form for each issue.*
2. *Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
3. *Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
4. *Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

III. Submitting Carrier(s) General Information

Submitted by: *TDS Metrocom*

Contact *Todd McNally*

Telephone Number: *608-441-7959*

e-mail: todd.mcnally@tdsmetro.com

Subject Matter Expert (SME): *Todd McNally*

Telephone Number: *608-441-7959*

e-mail: todd.mcnally@tdsmetro.com

Authorized Representative: *Rod Cox*

Telephone Number: *608-663-3029*

e-mail: rod.cox@tdsmetro.com

IV. Issue Identification

Name: *(short identifier) Joint Sonets*

1. *Brief Description: In April 2002, TDS Metrocom discovered that SBC was inappropriately billing us for joint sonet facilities contrary to our ICA.*

V. Analysis of Issue

Please answer the following questions:

1. *When this issue was first discovered?*

TDS Metrocom discovered this issue in April 2002.

<p>2. How many occurrences and approximately over how long a period of time? <i>Exact number of occurrences is unknown at this time. This has affected SBCs billing accuracy for 15 months and counting.</i></p> <p>3. Is it a recurring problem? <i>Yes. Contrary to SBC affidavits filed in March 2003 stating that they expect to close this issue within the next billing cycle, we continue to see these charges on our June 2003 invoices.</i></p> <p>4. Your belief as to the cause of the problem. <i>Based on our understanding of SBCs process, systems and invoices, TDS Metrocom is left with the impression that the cause for this exception is the result of SBCs inadequate billing OSS combined with lacking change management controls.</i></p> <p>5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. <i>TDS Metrocom feels that it is, specifically, SBC not being able to consistently implement change management events related to interconnection agreements.</i></p> <p>6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? <i>High</i></p> <p>7. Any other pertinent information? <i>Not at this time. We reserve the right to add additional information as it becomes available.</i></p>
<p>VI. Prior Attempts to Resolve the Issue (Please do not re-argue your case here or submit supporting documents.)</p> <p>Please answer the following questions:</p> <p>1. Was this issue raised with the opposing carrier? If so, when and how? <i>Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since November 2002.</i></p> <p>2. Was this issue escalated for dispute resolution? If so, when and in what forum? <i>Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since November 2002.</i></p> <p>3. Last known position of the opposing carrier. <i>SBC has acknowledged the validity of our dispute claim, however struggles to correct it and make appropriate adjustments in a timely manner.</i></p> <p>4. Were any bill adjustments made to resolve this issue? <i>Yes</i></p> <p>5. Were any policies or procedures changed to address this issue? If so, what changes were made? <i>TDS Metrocom can only assume that SBC is in the process of making changes..</i></p>
<p>VII. Relief Sought</p> <p><i>TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC:</i></p> <ol style="list-style-type: none"> <i>1. Audit of SBCs current process to assure that 100% of exceptions are corrected and billing stopped and adjusted accordingly.</i> <i>2. Provide documentation of SBCs process in place to assure that future exceptions are prevented.</i>
<p>VIII. Opposing Carrier's Response (to be completed after July 30, 2003, prehearing) (Briefly respond to submitting carrier(s) by either agreeing or disagreeing with</p>

statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
SBC had billed TDS for joint SONET facilities. In response, SBC explained that there was indeed an agreement not to bill for certain facilities, yet TDS was mistakenly billed for some DS3 lines because the Trunk Inventory Record Keeping System ("TIRKS") was not updated to reflect which circuits were joint circuits. Although the TIRKS database was updated as of October 2002, SBC has continued to work with TDS to provide appropriate adjustments for prior periods.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
Yes, and it has been confirmed per the Interconnection Agreement that Joint Sonet should not be billed.
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information?
All BAN's have been corrected and the account will be monitored until TDS is satisfied that the issue is closed.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
TDS reported in July 2003 that one additional SONET BAN was identified that was owed an adjustment. There were three circuits on the BAN that were adjusted resulting in a credit of \$1,120.00 to TDS. The incorrectly billed USOC has been corrected to reflect a "0" rate which will eliminate the need for any further dispute or adjustment on that BAN.
2. Were any bill adjustments made to resolve this issue? *Yes.*
3. How were the adjustments communicated to the submitting carrier?
Communicated via billing resolution forms from the LSC. Please attach any relevant accessible letter(s). N/A
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *No.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
TDS and SBC agreed that both companies would monitor the billing to make sure that the billing is correct, and SBC will make the adjustments if any charges appear in the future.
7. Were any policies or procedures changed to address this issue? If so, what changes were made?
Additional training has been provided to the service representatives to prevent such issues from recurring.

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *Jim Jermain*

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e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Sharmaine Summerville*

Telephone Number: *(312) 335-6724*

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X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. *Please complete a separate form for each issue.*
2. *Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
3. *Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
4. *Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

III. Submitting Carrier(s) General Information

Submitted by: *TDS Metrocom*
Contact *Todd McNally*
Telephone Number: *608-441-7959*
e-mail: *todd.mcnally@tdsmetro.com*

Subject Matter Expert (SME): *Todd McNally*
Telephone Number: *608-441-7959*
e-mail: *todd.mcnally@tdsmetro.com*

Authorized Representative: *Rod Cox*
Telephone Number: *608-663-3029*
e-mail: *rod.cox@tdsmetro.com*

IV. Issue Identification

Name: *Late Payment Charges (LPCs) / Interest*
Brief Description: *TDS Metrocom is expected by SBC to pay 100% of all charges billed by SBC by the due date on the invoice. Then, if we dispute any of the charges, we should dispute them after the fact. Combine this process with the lacking timeliness of SBCs billing dispute process, we are required to bear the financial risk. Additionally, when SBC does finally acknowledge the validity of a dispute claim of ours, they do not compensate us with interest on those funds. Due to this financial risk, that has no set duration, TDS Metrocom finds ourselves withholding payment for charges that we dispute. This causes LPCs to get assessed to our accounts. LPCs that we have to dispute*

on the back end once the dispute is resolved.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered? Ever since TDS Metrocom started purchasing products from SBC.
2. How many occurrences and approximately over how long a period of time? Exact number of occurrences is unknown although LPCs are automatically assessed to invoices with unpaid balances. It has been an issue ever since TDS Metrocom started purchasing products from SBC.
3. Is it a recurring problem? Yes.
4. Your belief as to the cause of the problem. TDS Metrocom is left to believe that the cause is due to SBCs monopolistic view of placing the burden on CLECs both financially as well as process.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? Yes and No. TDS Metrocom does not believe that SBC is in the position to be able to honor this section of our interconnection agreement.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? High.
7. Any other pertinent information? None at this time.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Not formally.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? Not formally.
3. Last known position of the opposing carrier. SBC expects TDS Metrocom to pay 100% of charges billed, regardless of accuracy, and dispute charges on the back end and wait for resolution.
4. Were any bill adjustments made to resolve this issue? Not applicable to this issue.
5. Were any policies or procedures changed to address this issue? If so, what changes were made? SBC has not communicated any policy or procedures to address this issue, nor is TDS aware of any.

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).) TDS Metrocom requests that in addition to a performance measure developed to capture such billing accuracy errors, that the following remedies get implemented by SBC:

- 1.) *SBC should be required to suspend the application of LPCs until a time determined by the Commission that SBCs Billing OSS has met an acceptable level. It is our understanding that other ROBCs (Qwest for sure) can control the automatic application of LPCs.*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
Stripped of its inflammatory rhetoric, TDS' "issue" is nothing more than an attempt to reargue an issue it arbitrated – and lost. See arbitration award, PSCW Docket No. 05-MA-123 at pp. 15-17. Pursuant to that award, the TDS/SBC Wisconsin ICA states, among other things, that TDS must pay all charges when due and place disputed amounts in escrow, and that all escrowed amounts shall be subject to Late Payment Charges (LPCs)(see, generally, section 15 of the parties ICA for explicit language). This docket is not the proper forum to relieve TDS of its contractual obligation or to afford TDS an opportunity to reargue rejected positions or to negotiate new terms.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *See above.*
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information? *No.*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *See above.*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *See above.*
4. Identify any other carrier(s) known to have experienced similar problems. *See above.*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *See above.*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Fred Christensen*
Telephone Number: *(414) 319-5617*
e-mail: *fc1618@sbc.com*

Authorized Representative: *Carla Rowland*
Telephone Number: *(214) 464-7511*
e-mail: *cb8043@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose
<i>This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.</i>
II. Directions
<ol style="list-style-type: none"> 1. Please complete a separate form for each issue. 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission. 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference. 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.
III. Submitting Carrier(s) General Information
<p>Submitted by: <i>TDS Metrocom</i> Contact <i>Todd McNally</i> Telephone Number: <i>608-441-7959</i> e-mail: <i>todd.mcnally@tdsmetro.com</i></p> <p>Subject Matter Expert (SME): <i>Todd McNally</i> Telephone Number: <i>608-441-7959</i> e-mail: <i>todd.mcnally@tdsmetro.com</i></p> <p>Authorized Representative: <i>Rod Cox</i> Telephone Number: <i>608-663-3029</i> e-mail: <i>rod.cox@tdsmetro.com</i></p>
IV. Issue Identification
<p>Name: <i>Missing Residential/Business Identifier</i> Brief Description: <i>There are separate code identifiers, MUJSE for Residential and MUJCE for Business, that SBC places on their bill to identify which circuits are entered into their system as Residential versus Business. TDS Metrocom has discovered recently that SBC is failing to consistently provide such identifier, preventing TDS Metrocom from validating SBCs invoice.</i></p>
V. Analysis of Issue
<p>Please answer the following questions:</p> <ol style="list-style-type: none"> 1. When this issue was first discovered? <i>July 2003</i>

2. How many occurrences and approximately over how long a period of time? Exact number of occurrences is unknown. Although we did not catch this until July 2003, we have examples appearing on our April 2003 invoices. We also have reason to believe that it had been happening prior to us catching it on our April 2003 invoices.
3. Is it a recurring problem? Yes
4. Your belief as to the cause of the problem. We have reason to believe that the cause of this problem is due to inadequate Billing OSS.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. TDS does not believe it is.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? High.
7. Any other pertinent information? None at this time. TDS continues to research the extent of which this issue affects our invoices.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes. July 2003 via email to the billing Area Manager.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? Yes. July 2003 via email to the billing Area Manager.
3. Last known position of the opposing carrier. As of July 23, SBC has not responded to our inquiry regarding this issue.
4. Were any bill adjustments made to resolve this issue? No
5. Were any policies or procedures changed to address this issue? If so, what changes were made? SBC has not communicated any policy or procedures to address this issue, nor is TDS aware of any.

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).) TDS Metrocom requests that in addition to a performance measure developed to capture such billing accuracy errors, that the following remedies get implemented by SBC:

- 1.) *Audit to assure that 100% of exceptions are identified and corrected.*
- 2.) *Results of audit described in #1 above with TDS Metrocom.*
- 3.) *Some periodic audit to monitor #1 above due to change management issues.*
- 4.) *Documented process illustrating how this identifier is determined, placed on the bill, and validated.*
- 5.) *Comparison of different process' followed for retail compared to wholesale as it pertains to #4 above.*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

A. Analysis of Issue

1. Your belief as to the cause of the problem.

LSC service representative error.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain

SBC does not believe this issue to involve an interpretation or application of law.

3. What performance measures can be implemented to monitor the desired system operation?

The small manual error rate noted below should negate the necessity for any PM requirement.

4. Any other pertinent information?

The SBC Midwest LSC is aware of one instance in which a service representative erred in processing a TDS Metrocom request to change the billing name on an account that misidentified a TDS Metrocom residential customer as a business customer. On July 2, 2003, Mr. Todd McNally of TDS Metrocom sent an email to the LSC Management team identifying two circuits on the same account that were purportedly mismarked and asked that the LSC investigate. The results of that investigation revealed that an SBC service representative erred in processing the request by TDS Metrocom to change the account billing name and did not ensure that the account was clearly identified as a residential account. The LSC would normally have had corrected the account in question. However, TDS subsequently disconnected the circuits negating the necessity to do so. Additionally, it is not only the LSC policy to merely correct errors of this nature when found, it is also LSC policy to have the appropriate coaching discussion with the service representative who made the error so that the same error can be avoided in the future.

*This isolated incident resulted in one order in question and represented approximately *****[redacted]%** of all TDS Metrocom ordering activity in the state of Wisconsin during the month of July 2003. (*****[redacted] error / [redacted] Total Firm Order Confirmations (FOC) During July 2003 x 100 = [redacted]%**).*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *Yes.*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *Via the CLEC's invoice.*
4. Identify any other carrier(s) known to have experienced similar problems. *None that the LSC is aware of.*
5. Did you identify any other problems arising from or related to this issue? *No.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *See above.*
7. Were any policies or procedures changed to address this issue? *No.* If so, what changes were made? *No.*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Fred Christensen*

Telephone Number: *(414) 319-5617*

e-mail: *fc1618@sbc.com*

Authorized Representative: *Carla Rowland*

Telephone Number: *(214) 464-7511*

e-mail: *cb8043@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. *Please complete a separate form for each issue.*
2. *Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
3. *Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
4. *Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

III. Submitting Carrier(s) General Information

Submitted by: *TDS Metrocom*

Contact *Todd McNally*

Telephone Number: *608-441-7959*

e-mail: todd.mcnally@tdsmetro.com

Subject Matter Expert (SME): *Todd McNally*

Telephone Number: *608-441-7959*

e-mail: todd.mcnally@tdsmetro.com

Authorized Representative: *Rod Cox*

Telephone Number: *608-663-3029*

e-mail: rod.cox@tdsmetro.com

IV. Issue Identification

Name: *(short identifier) Multiple Monthly Recurring Charges (MRC) as a single Non-Recurring Charge (NRC).*

Brief Description: *In October 2002, TDS Metrocom discovered that SBC was placing on our non recurring charges section of our invoice, a single charge that consisted of multiple months worth of monthly recurring charges (MRC). In some cases, there were up to 37 months worth of MRCs listed as a single NRC charge. Issues due to this issue include, but not limited to;*

1. *SBC back billing more than 3 years worth of activity..*

2. *Unnecessary validation efforts by us..*

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?

TDS Metrocom discovered this issue in October 2002.

2. How many occurrences and approximately over how long a period of time?

Exact number of occurrences is unknown at this time. This has affected SBCs billing accuracy as far back as 1999. We continue to research to see if this issue continues to happen.

3. Is it a recurring problem?

We continue to research to see if this issue continues to happen.

4. Your belief as to the cause of the problem.

Based on our understanding of SBCs process, systems and invoices, TDS Metrocom is left with the impression that the cause for this exception is the result of SBCs inadequate billing OSS.

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *TDS Metrocom does not feel that it does.*

6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? *High*

7. Any other pertinent information? *Not at this time. We reserve the right to add additional information as it becomes available.*

VI. Prior Attempts to Resolve the Issue (Please do not re-argue your case here or submit supporting documents.)

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?

Yes. Via numerous conversations and written communication with SBC Account Management since October 2002.

2. Was this issue escalated for dispute resolution? If so, when and in what forum?

Yes. Via numerous conversations and written communication with SBC Account Management since October 2002.

3. Last known position of the opposing carrier.

After bringing this issue to SBCs attention roughly 9 months ago, we have yet to see any progress made by SBC to rectify this issue.

4. Were any bill adjustments made to resolve this issue?

Not that we are aware of.

5. Were any policies or procedures changed to address this issue? If so, what changes were made?

TDS Metrocom is not aware of any changes.

VII. Relief Sought

TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC:

1. *Perform audit of SBCs current process to assure that SBC is billing activity on a timely basis.*
2. *Perform an audit to assure that all exceptions are indeed identified.*
3. *Periodic audit to identify back sliding.*
4. *Audit to validate that all appropriate adjustments to billing have been made.*

5. *Documented process how circuits are entered into the SBC systems, billed and audited in case of a dispute.*
6. *Documented differences in how similar exceptions are cared for when the same thing happens on the retail side.*

VIII. Opposing Carrier's Response (to be completed after July 30, 2003, prehearing)

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
Service Representative manual error.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
Yes. See below at VIII A.4..
3. What performance measures can be implemented to monitor the desired system operation?
During the next six-month review, SBC is proposing the following PMs in order to measure its performance in regard to the billing dispute and resolution process.

PM CLEC BLG-2 - Measures the percent of time that SBC Midwest acknowledges CLEC billing claims/disputes within 5 business days of receipt by SBC Midwest.

PM CLEC BLG-3 - Measures the percent of time that SBC Midwest sends claims resolution notifications to the CLEC within 30 business days of receipt by SBC Midwest.

4. Any other pertinent information?
Like several other issue raised by the CLECs, this issue does not appear to be a matter pertaining to Wisconsin. To the extent that this is not a Wisconsin issue, the matter should be stricken from this docket.

In ¶ 56 of his FCC comment filing in regard to SBC Michigan's 271 application, Mr. Cox of TDS Metrocom claimed that TDS Metrocom had discovered SBC was back-billing monthly recurring charges as non-recurring charges for loops from 1999 to the present. On October 23, 2002, TDS provided an example bill concerning this issue to SBC Midwest for investigation. At a meeting on February 18, 2003, TDS raised the issue and requested a status.

As a result of that request, TDS Metrocom was informed that it appears it had been back-billed in connection with proactive efforts undertaken by the LSC to make sure that any service order errors that were not resolved through normal process were investigated and corrected. The category of orders targeted by this special work effort were very old and had not been resolved by the LSC Service Representatives either due to lack of knowledge regarding the specific error type, or because reports displaying these errors were not available at the time the error

occurred.

Due to one such unresolved error, TDS Metrocom was not billed for two loops that were provisioned by SBC Midwest in June 1999. In resolving that service order, the LSC service representative mistakenly applied the monthly recurring charges from the original June 1999 loop installation date as a one time non-recurring charge. This resulted in a total of \$(redacted) in charges, consisting of non-recurring charges and recurring charges, to be applied on a one-time basis to recover unbilled amounts. It was later determined that the non-recurring amounts of this adjustment should not have been applied since the installation pre-dated the allowable revenue recovery period in the TDS Metrocom interconnection agreement. Further, a portion of the recurring amount was also applied in error. Appropriate adjustments for this have already been made and the LSC has made changes to the process for this special error correction team to insure that further back-billing errors do not occur.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *See above.*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *See above.*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *See above.*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact : *James Jermain*

Telephone Number: *608-252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Frederick C. Christensen*

Telephone Number: *(414)-319-5617*

e-mail: *fc1618@sbc.com*

Authorized Representative: *Carla Rowland*

Telephone Number: *214-464-7511*

e-mail: *cb8043@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition <i>(for staff use only)</i>

MN183332_1.DOC – TDS –19 (redacted)

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose
<i>This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.</i>
II. Directions
<ol style="list-style-type: none"> 1. Please complete a separate form for each issue. 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission. 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference. 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.
III. Submitting Carrier(s) General Information
<p>Submitted by: <i>TDS Metrocom</i> Contact <i>Todd McNally</i> Telephone Number: <i>608-441-7959</i> e-mail: <i>todd.mcnelly@tdsmetro.com</i></p> <p>Subject Matter Expert (SME): <i>Todd McNally</i> Telephone Number: <i>608-441-7959</i> e-mail: <i>todd.mcnelly@tdsmetro.com</i></p> <p>Authorized Representative: <i>Rod Cox</i> Telephone Number: <i>608-663-3029</i> e-mail: <i>rod.cox@tdsmetro.com</i></p>
IV. Issue Identification
<p>Name: Credit Adjustment by Billing Account Number (BAN) process.</p> <p>Brief Description: Although SBC requires TDS Metrocom to complete detailed dispute claim forms, identifying line item disputes, by BAN, by Bill Date, etc, etc, SBC in some cases, requests TDS Metrocom to allow SBC to place a lump sum credit adjustment on a single BAN as opposed to making the appropriate adjustments on the respective BANs that they assessed the charges originally. This issue causes unnecessary time consuming administrative accounting work for TDS Metrocom. If SBCs billing was accurate in the first place, this would not be an issue.</p>
V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered? February 2003
2. How many occurrences and approximately over how long a period of time? Not applicable to this issue.
3. Is it a recurring problem? Yes.
4. Your belief as to the cause of the problem. TDS Metrocom is left to believe that the cause is due to SBCs attempt to limit the amount of resource time required of them to process dispute resolution claims without regard of the time required of the CLEC that was the victim of SBCs inaccurate billing.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? TDS Metrocom does not believe that it is.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? Low.
7. Any other pertinent information? None at this time.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes. February 2003 via phone discussions with SBC Account Management.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? Yes. February 2003 via phone discussions with SBC Account Management.
3. Last known position of the opposing carrier. SBC prefers to place adjustments on TDS Metrocoms invoice via one lump sum on a single BAN when available.
4. Were any bill adjustments made to resolve this issue? Not applicable to this issue.
5. Were any policies or procedures changed to address this issue? If so, what changes were made? SBC has not communicated any policy or procedures to address this issue, nor is TDS aware of any.

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).) TDS Metrocom requests that in addition to a performance measure developed to capture such billing accuracy errors, that the following remedies get implemented by SBC:

- 1.) *SBC be required to make adjustments to CLECs invoices consistent with the manner of which charges are assessed (By BAN).*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
SBC does not believe that this issue has merit and would have been better served as a business-to-business discussion point between the parties.
2. Does this issue involve an interpretation and/or application of law, contract or

tariff? If so, please explain. *SBC does not believe this issue to involve an interpretation or application of law.*

3. What performance measures can be implemented to monitor the desired system operation? *N/A*

4. Any other pertinent information?

In order to sufficiently investigate disputed charges on a CLEC's bill, it is necessary that the CLEC provide the detailed information on the charge it is disputing. This is a detailed process, but a necessary one, as it enables the claims representative to specifically identify the item being disputed. Once a resolution has been reached regarding a claim or group of claims, it is SBC's understanding that it is of utmost importance that the remedy, i.e., the adjustment for the incorrect charges, be made expeditiously to the CLEC.

The most efficient and timely manner for providing the credit to the CLEC is, in many instances, to provide single adjustments to cover multiple issues. If this causes tremendous burden to the CLECs, SBC Midwest will, within reason, agree to alternative solutions; however, the tradeoff will be in the time it takes to issue the appropriate individual corrections to the CLEC.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information (to be completed after July 30, 2003, prehearing)

Submitted by: *SBC*

Contact : *James Jermain*

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X. Further Investigative Activities <i>(for staff use only)</i>
XI. Final Disposition <i>(for staff use only)</i>

MN182808_1